

**BEFORE THE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation     )  
Against:                                     )

Rupdev Singh Khosa, M.D.             )

Case No. 800-2013-000966

Physician's and Surgeon's             )  
Certificate No. A54411                 )

Respondent                                 )

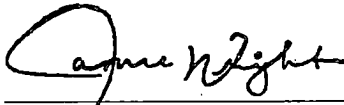
**DECISION**

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on August 25, 2017.

IT IS SO ORDERED July 27, 2017.

**MEDICAL BOARD OF CALIFORNIA**

By:   
\_\_\_\_\_  
Jamie Wright, JD, Chair  
Panel A

1 XAVIER BECERRA  
Attorney General of California  
2 E. A. JONES III  
Supervising Deputy Attorney General  
3 BENETH A. BROWNE  
Deputy Attorney General  
4 State Bar No. 202679  
Department of Justice  
5 300 So. Spring Street, Suite 1702  
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6 Telephone: (213) 897-7816  
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7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**MEDICAL BOARD OF CALIFORNIA**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **RUPDEV SINGH KHOSA, M.D.**  
14 **385 Torrey Pines Drive**  
**Arcadia, CA 91006**

15 **Physician's and Surgeon's Certificate No. A**  
16 **54411**

17 Respondent.

Case No. 800-2013-000966

OAH No. 2017020751

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

18  
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board  
23 of California (Board). She brought this action solely in her official capacity and is represented in  
24 this matter by Xavier Becerra, Attorney General of the State of California, by Beneth A. Browne,  
25 Deputy Attorney General.

26 2. Respondent Rupdev Singh Khosa, M.D. (Respondent) is represented in this  
27 proceeding by attorney Peter R. Osinoff, Esq., whose address is: 355 S. Grand Ave., #1750, Los  
28 Angeles, CA 90071-1562.

3. On or about July 19, 1995, the Board issued Physician's and Surgeon's Certificate No. A 54411 to Respondent. The Physician's and Surgeon's Certificate was in full force and effect at all times relevant to the charges brought in Accusation No. 800-2013-000966, and will expire on June 30, 2019, unless renewed.

## JURISDICTION

4. Accusation No. 800-2013-000966 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on November 4, 2016. Respondent timely filed his Notice of Defense contesting the Accusation.

5. A copy of Accusation No. 800-2013-000966 is attached as exhibit A and incorporated herein by reference.

## ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 800-2013-000966. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

7. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

## CULPABILITY

9. Respondent understands and agrees that the charges and allegations in Accusation No. 800-2013-000966, if proven at a hearing, constitute cause for imposing discipline upon his Physician's and Surgeon's Certificate.

10. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent does not contest that, at an administrative hearing, Complainant could establish a *prima facie* case with respect to the charges and allegations contained in Accusation No. 800-2013-000966 and that he has thereby subjected his license to disciplinary action.

11. Respondent agrees that his Physician's and Surgeon's Certificate is subject to discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the Disciplinary Order below.

## CONTINGENCY

12. This stipulation shall be subject to approval by the Medical Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Medical Board of California may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

13. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

## DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. A 54411 issued to Respondent shall be and is hereby Publicly Reprimanded pursuant to California Business and

1 Professions Code section 2227, subdivision (a)(4). This Public Reprimand, which is issued in  
2 connection with Accusation No. 800-2013-000966 is as follows:

3 Your documentation of symptoms and treatment in your computerized progress notes  
4 for patient T.P. was inadequate or inaccurate, in violation of California Business and  
5 Professions Code sections 2234 and 2266.

6 1. PREScribing PRACTICES COURSE. Within 60 calendar days of the effective  
7 date of this Decision, Respondent shall enroll in a course in prescribing practices approved in  
8 advance by the Board or its designee. Respondent shall provide the approved course provider  
9 with any information and documents that the approved course provider may deem pertinent.  
10 Respondent shall participate in and successfully complete the classroom component of the course  
11 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully  
12 complete any other component of the course within one (1) year of enrollment. The prescribing  
13 practices course shall be at Respondent's expense and shall be in addition to the Continuing  
14 Medical Education (CME) requirements for renewal of licensure.

15 A prescribing practices course taken after the acts that gave rise to the charges in the  
16 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
17 or its designee, be accepted towards the fulfillment of this condition if the course would have  
18 been approved by the Board or its designee had the course been taken after the effective date of  
19 this Decision.

20 Respondent shall submit a certification of successful completion to the Board or its  
21 designee not later than 15 calendar days after successfully completing the course, or not later than  
22 15 calendar days after the effective date of the Decision, whichever is later.

23 2. MEDICAL RECORD KEEPING COURSE. Within 60 calendar days of the effective  
24 date of this Decision, Respondent shall enroll in a course in medical record keeping approved in  
25 advance by the Board or its designee. Respondent shall provide the approved course provider  
26 with any information and documents that the approved course provider may deem pertinent.  
27 Respondent shall participate in and successfully complete the classroom component of the course  
28 not later than six (6) months after Respondent's initial enrollment. Respondent shall successfully

1 complete any other component of the course within one (1) year of enrollment. The medical  
2 record keeping course shall be at Respondent's expense and shall be in addition to the Continuing  
3 Medical Education (CME) requirements for renewal of licensure.

4 A medical record keeping course taken after the acts that gave rise to the charges in the  
5 Accusation, but prior to the effective date of the Decision may, in the sole discretion of the Board  
6 or its designee, be accepted towards the fulfillment of this condition if the course would have  
7 been approved by the Board or its designee had the course been taken after the effective date of  
8 this Decision.

9 Respondent shall submit a certification of successful completion to the Board or its  
10 designee not later than 15 calendar days after successfully completing the course, or not later than  
11 15 calendar days after the effective date of the Decision, whichever is later.

12 ACCEPTANCE

13 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
14 discussed it with my attorney, Peter R. Osinoff, Esq.. I understand the stipulation and the effect it  
15 will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and  
16 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
17 Decision and Order of the Medical Board of California.

18  
19 DATED: 6/1/17

Rupdev Singh Khosa  
RUPDEV SINGH KHOSA, M.D.  
Respondent

21 I have read and fully discussed with Respondent RUPDEV SINGH KHOSA, M.D. the  
22 terms and conditions and other matters contained in the above Stipulated Settlement and  
23 Disciplinary Order. I approve its form and content.

24  
25 DATED: 6/1/17

Peter R. Osinoff  
PETER R. OSINOFF, ESQ.  
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Medical Board of California.

Dated: June 1, 2017

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
E. A. JONES III  
Supervising Deputy Attorney General

*Beneth A Browne*

BENETH A. BROWNE  
Deputy Attorney General  
*Attorneys for Complainant*

LA2016503476  
62413016

**Exhibit A**

**Accusation No. 800-2013-000966**



1 KAMALA D. HARRIS  
2 Attorney General of California  
3 E. A. JONES III  
4 Supervising Deputy Attorney General  
5 BENETH A. BROWNE  
6 Deputy Attorney General  
7 State Bar No. 202679  
California Department of Justice  
300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
Telephone: (213) 897-7816  
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*Attorneys for Complainant*

FILED  
STATE OF CALIFORNIA  
MEDICAL BOARD OF CALIFORNIA  
SACRAMENTO 06/04/2016  
BY: [Signature] ANALYST

8 **BEFORE THE**  
9 **MEDICAL BOARD OF CALIFORNIA**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 800-2013-000966

13 **Rupdev Singh Khosa, M.D.**  
14 **385 Torrey Pines Drive**  
15 **Arcadia, CA 91006**

**A C C U S A T I O N**

16 **Physician's and Surgeon's Certificate**  
17 **No. A 54411,**

Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official  
21 capacity as the Executive Director of the Medical Board of California, Department of Consumer  
22 Affairs (Board).

23 2. On or about July 19, 1995, the Medical Board issued Physician's and Surgeon's  
24 Certificate Number A 54411 to Rupdev Singh Khosa, M.D. (Respondent). The Physician's and  
25 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought  
26 herein and will expire on June 30, 2017, unless renewed.

27 **JURISDICTION**

28 3. This Accusation is brought before the Board, under the authority of the following

1 laws. All section references are to the Business and Professions Code unless otherwise indicated.

2 4. Section 2229 of the Code states, in subdivision (a):

3 "Protection of the public shall be the highest priority for the Division of Medical Quality,<sup>[1]</sup>  
4 the California Board of Podiatric Medicine, and administrative law judges of the Medical Quality  
5 Hearing Panel in exercising their disciplinary authority."

6 5. Section 2227 of the Code provides that a licensee who is found guilty under the  
7 Medical Practice Act may have his or her license revoked, suspended for a period not to exceed  
8 one year, placed on probation and required to pay the costs of probation monitoring, or such other  
9 action taken in relation to discipline as the Board deems proper.

10 6. Section 2234 of the Code states,

11 "The board shall take action against any licensee who is charged with unprofessional  
12 conduct. In addition to other provisions of this article, unprofessional conduct includes, but is not  
13 limited to, the following:

14 "(a) Violating or attempting to violate, directly or indirectly, assisting in or abetting the  
15 violation of, or conspiring to violate any provision of this chapter.

16 "(b) Gross negligence.

17 "(c) Repeated negligent acts. To be repeated, there must be two or more negligent acts or  
18 omissions. An initial negligent act or omission followed by a separate and distinct departure from  
19 the applicable standard of care shall constitute repeated negligent acts.

20 "(1) An initial negligent diagnosis followed by an act or omission medically appropriate  
21 for that negligent diagnosis of the patient shall constitute a single negligent act.

22 "(2) When the standard of care requires a change in the diagnosis, act, or omission that  
23 constitutes the negligent act described in paragraph (1), including, but not limited to, a  
24 reevaluation of the diagnosis or a change in treatment, and the licensee's conduct departs from the  
25 applicable standard of care, each departure constitutes a separate and distinct breach of the

26  
27 <sup>1</sup> Pursuant to Business and Professions Code section 2002, the "Division of Medical  
28 Quality" or "Division" shall be deemed to refer to the Medical Board of California.

1 standard of care.

2 "..."

3 7. Section 2266 of the Code states: "The failure of a physician and surgeon to maintain  
4 adequate and accurate records relating to the provision of services to their patients constitutes  
5 unprofessional conduct."

### 6 **FIRST CAUSE FOR DISCIPLINE**

#### 7 **(Repeated Negligent Acts)**

8 8. Respondent is subject to disciplinary action under section 2234, subdivision (c), in  
9 that he committed repeated negligence in the care and treatment of a patient. The circumstances  
10 are as follows:

11 9. On or about May 15, 2012, patient T.P., a 33 year old female, initially presented to  
12 Respondent, a physiatrist, for treatment. "Reason for Appointment" was documented as post-  
13 laminectomy chronic pain; low back pain; muscle spasms; panic disorder; and, initial visit. "Past  
14 Medical History" was documented as lumbar laminectomy and chronic pain; post nasal drip;  
15 cough; and allergic rhinitis. The documented "Assessment" included diagnoses of: post  
16 laminectomy syndrome; polyneuropathy; pain-chronic syndrome: regional pain syndrome -  
17 complex; lumbar disc disease; lumbar stenosis; radiculopathy - lumbar; spondylosis - lumbar;  
18 sprain/strain - lumbar; and fibromyositis. The documented "Treatment" was to continue  
19 oxycodone and hydrocodone that she stated she currently used.

20 10. Subsequently, patient T.P. presented for follow-up appointments nearly every month  
21 until her last appointment with Respondent in October of 2014. Respondent regularly prescribed  
22 patient T.P. oxycodone and hydrocodone throughout the whole timeframe.<sup>2</sup> At various points,  
23 other medical issues were documented and other medications were regularly prescribed, as  
24 referenced below, including Soma,<sup>3</sup> Xanax<sup>4</sup> and promethazine with codeine.<sup>5</sup>

25 <sup>2</sup> Description of the regular prescribing of oxycodone and hydrocodone and the related  
26 diagnoses and symptoms generally is excluded from discussion of care and treatment of patient  
T.P. after this paragraph, because they are not at issue.

27 <sup>3</sup> Soma is a brand name for carisoprodol, a drug prescribed for the treatment and relief of  
28 short-term acute painful muscles and skeletal conditions in adults. It is a schedule IV controlled  
(continued...)

1 11. On or about June 5, 2012, Respondent had a follow-up appointment with patient T.P.  
2 At this visit, "Past Medical History" included documentation of allergic rhinitis and off and on  
3 cough. The "Review of Symptoms" indicated documentation of no cough, muscle spasms and off  
4 and on panic attacks. The "Reason for Appointment" included "muscle spasms legs and cramps  
5 at night."

6 12. On or about July 10, 2012, Respondent had a follow-up appointment with patient T.P.  
7 At this visit, "Past Medical History" included documentation of allergic rhinitis and panic  
8 disorder. The "Review of Symptoms" indicated documentation of no cough. The "Reason for  
9 Appointment" included "muscle spasms." The "Assessment" documented a diagnosis of spasm  
10 of muscle.

11 13. On or about August 28, 2012, Respondent had a follow up appointment with patient  
12 T.P. The "Reason for Appointment" documentation included muscle spasms. Likewise,  
13 documentation in "Assessments" section included muscle spasm. Although Respondent wrote a  
14 prescription for patient T.P. for 100 Soma tablets at this visit, the treatment is not documented;  
15 there is no reference to Soma charted. Likewise, there is no identification of the target systems of  
16 Soma, the purpose of the therapy, or the effects of the medication on said target systems over time  
17 to ensure the treatment is safe and effective.

18 14. On or about September 25, 2012, Respondent hand-wrote a chart note about the  
19

20 (...continued)

21 substance pursuant to Health and Safety Code section 11052, subdivision (d)(17), and a  
22 dangerous drug pursuant to Business and Professions Code section 4022.

23 <sup>4</sup> Xanax is a brand name for alprazolam, a benzodiazepine medication used to treat anxiety  
24 and panic disorders. It is a schedule IV controlled substance pursuant to Health and Safety Code  
25 section 11052, subdivision (d)(17), and a dangerous drug pursuant to Business and Professions  
26 Code section 4022.

27 <sup>5</sup> Promethazine with codeine is a purple-colored cough syrup. Codeine is a schedule II  
28 controlled substance pursuant to Health and Safety Code section 11052, subdivision (d)(17), and  
a dangerous drug pursuant to Business and Professions Code section 4022. It is a drug of abuse  
referred to as "purple drank" when mixed with soda. According to the National Institute on Drug  
Abuse, when abused, it presents a high risk of fatal overdose by depressing the central nervous  
system which can slow or stop the heart and lungs. Promethazine is a dangerous drug pursuant to  
Business and Professions Code section 4022.

1 appointment including references to anxiety and coughing.

2 15. On or about October 2, 2012, Respondent had a follow-up appointment with patient  
3 T.P. Respondent documented the appointment in an electronic medical record. The "Review of  
4 Systems" indicated there was no cough. The "Physical Examination" referenced that the lungs  
5 were clear except for occasional wheezes. The "Treatment" section listed issues to be treated  
6 followed by method of treatment. As treatment for lower back pain, Respondent documented,  
7 "Start Soma Tablet, 350 mg, 1 tablet as needed, orally, three a day, 30 days, 90." Although  
8 Respondent had prescribed Soma earlier, this is the first reference to Soma in the medical records.  
9 Aside from being listed under the general treatment category of "back pain," there is no specific  
10 indication of the target symptoms, purpose of the therapy and the effects of the medication on  
11 said target symptoms to ensure the treatment is safe and efficacious over time.

12 16. Also on or about October 2, 2012, "Assessments" included Respondent's diagnosis of  
13 anxiety. In the "Treatment" section, as treatment for anxiety, Respondent documented issuing a  
14 prescription for Xanax (alprazolam), 2 mg, twice daily (#60). Respondent failed to document a  
15 description of the nature, extent or prior history of patient T.P.'s anxiety. Likewise, regarding the  
16 prescription for Xanax, Respondent failed to note in the record the target symptoms, the purpose  
17 of the therapy, and the effects of the medication on said target symptoms over time to ensure the  
18 treatment was safe and efficacious.

19 17. On or about November 6, 2012, for a follow-up appointment with patient T.P.,  
20 Respondent documented the appointment in an electronic medical record. "Current Medications"  
21 included Soma and Xanax. "Past Medical History" included "allergic rhinitis and cough" and  
22 panic disorder. The "Review of Symptoms" indicated, in part, that on and off severe back pain  
23 was worse with coughing. "Assessments" included anxiety and bronchitis. Respondent's  
24 documented plan for "Treatment" included issuing a prescription for Xanax, 2 mg, 1 tablet,  
25 orally, three times a day, increased from two. Additional treatment included starting  
26 Promethazine HCl Syrup, 6.25 mg/ml, 5 ml, orally, three times a day. Respondent failed to list  
27 actual symptoms or diagnoses to support the ongoing use of promethazine and codeine.

28 18. On or about December 4, 2012, documentation of "Current Medications" included

1 Soma, Xanax and Promethazine HCl. "Assessments" included anxiety, bronchitis and muscle  
2 spasm. "Treatment" documented a plan to continue medications. New prescriptions for the  
3 medications were issued.

4 19. On or about January 8, 2013, "Reason for Appointment" was documented as a  
5 follow-up visit. "Current Medications" included Soma, Xanax and Promethazine HCl. "Past  
6 Medical History" included "allergic rhinitis and muscle spasms and cough" as well as panic  
7 disorder. Respondent's documented "Assessments" included anxiety and bronchitis. Respondent  
8 continued prescriptions to patient T.P. of Soma, Xanax and promethazine with codeine.

9 20. On or about February 8, 2013, "Reason for Appointment" included muscle spasms in  
10 legs and cramps, anxiety and panic disorder. "Current Medications" included Soma, Xanax and  
11 Promethazine HCl. "Past Medical History" included "allergic rhinitis and cough post nasal drip"  
12 and panic disorder. "Assessments" included anxiety and bronchitis. Respondent wrote patient  
13 T.P. a prescription for 90 Soma pills. Respondent continued prescriptions to patient T.P. of  
14 Xanax and promethazine with codeine as well.

15 21. Respondent continued to document regular appointments with patient T.P. and  
16 continued to prescribe her Soma, Xanax and promethazine with codeine. At the last appointment,  
17 on or about October 22, 2014, "Current Medications" were documented to include Soma, Xanax  
18 and Promethazine HCl. "Assessments" were documented to include anxiety, bronchitis, spasm of  
19 muscle, allergic rhinitis and panic attack. Respondent documented the treatment plan for spasm  
20 of muscle to be Soma prn and for panic attack(s) as Xanax prn tid.

21 22. On or about and between August 28, 2012, and October 2, 2012, Respondent was  
22 negligent in his care and treatment of patient T.P. in that he failed to reference treatment with  
23 Soma in the medical record.

24 23. Beginning or about October 2, 2012, and thereafter, Respondent was negligent in his  
25 care and treatment of patient T.P. in that he prescribed and continued to prescribe Xanax to T.P.  
26 without documenting in the record identification of the target symptoms, the purpose of the  
27 therapy, and the effects of the medication on said target symptoms to ensure the treatment is safe  
28 and efficacious.

24. Beginning on or about November 6, 2012, Respondent was negligent in his care and treatment of patient T.P. in that he prescribed and continued to prescribe promethazine and codeine elixir to T.P. without documenting in the record any symptoms or diagnoses to support the ongoing use of promethazine and codeine.

## SECOND CAUSE FOR DISCIPLINE

**(Failure to Maintain Adequate and Accurate Medical Records)**

25. Respondent is subject to disciplinary action under section 2266 of the Code in that he failed to maintain adequate and accurate records of the services he provided to a patient. The circumstances are as follows:

26. The facts and circumstances alleged in the First Cause for Discipline are incorporated here as if fully set forth.

### THIRD CAUSE FOR DISCIPLINE

**(General Unprofessional Conduct)**

27. Respondent is subject to disciplinary action under section, 2234 of the Code in that he engaged in unprofessional conduct. The circumstances are as follows:

28. The facts and circumstances alleged in the First and Second Causes for Discipline are incorporated here as if fully set forth.

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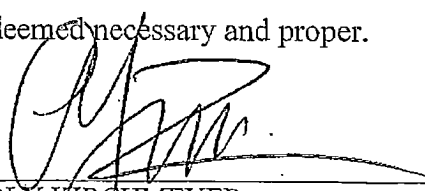
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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Medical Board of California issue a decision:

1. Revoking or suspending Physician's and Surgeon's Certificate Number A 54411, issued to Rupdev Singh Khosa, M.D.;
2. Revoking, suspending or denying approval of Rupdev Singh Khosa, M.D.'s authority to supervise physician assistants, pursuant to section 3527 of the Code;
3. Ordering Rupdev Singh Khosa, M.D., if placed on probation, to pay the Board the costs of probation monitoring; and
4. Taking such other and further action as deemed necessary and proper.

DATED: 11/4/16

  
KIMBERLY KIRCHMEYER  
Executive Director  
Medical Board of California  
Department of Consumer Affairs  
State of California  
*Complainant*

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